

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**V.**

ADRIAN LEMONS, et al.

**Defendants.**

$$\begin{pmatrix} \cdot \\ \cdot \\ \cdot \\ \cdot \\ \cdot \\ \cdot \\ \cdot \\ \cdot \end{pmatrix}$$

**No.: 4:15-CR-404-HEA NAB**

**CONSENT MOTION TO CONTINUE SENTENCING**

COMES NOW Defendant Adrian Lemons, by and through his attorneys Daniel J. Bruntrager and Kathryn Parish, and requests a continuance of the sentencing in this matter of at least 30 days, and in support states:

1. The sentencing is currently set for September 11<sup>th</sup>. The United States recently received an extension, by consent, until September 9<sup>th</sup> to respond to objections to the presentence report. The objections are substantial, and depending on the Government's response, Mr. Lemons may seek leave to reply.
2. Additionally, the parties are still in the process of determining whether they may be able to work out certain issues so as to minimize the number of contested issues at sentencing. Today, counsel went to visit Mr. Lemons at the Warren County jail partly to that end. However, when counsel arrived, they learned that due to construction, the Warren County jail currently does not have a facility or area in which confidential client communications can take place. Counsel have consulted with the federal marshals who have stated that they likely will be able to bring Mr. Lemons in for a client meeting sometime next week, but it is imperative that counsel

are able to meet confidentially with their client before they are able to work out any issues with regard to sentencing or determine their approach to sentencing.

3. The final pre-sentence report has not yet been filed. It is counsel's desire to file a sentencing memorandum in this case, but in order to be able to appropriately determine the issues that require further discussion in the context of a sentencing memorandum, it is necessary that counsel are able to see the Final Presentence report and how the probation office resolves certain objections. More time is thus needed.
4. It is therefore in the interest of justice and all parties that more time is granted
5. Undersigned counsel have consulted with one another and AUSA regarding their exclusionaries. At least one necessary counsel is unavailable on each of the following dates: October 7-11, October 15-19, October 21 – 25, November 4 – 29; December 2-
6. Counsel has consulted with AUSA Erin Granger, and she consents to this request.

WHEREFORE, for the foregoing reasons, Defendant respectfully requests that the sentencing hearing in this case be continued for at least 30 days, and rescheduled for a date and time where all necessary counsel are available.

/s/ Kathryn B. Parish

Kathryn B. Parish, #61782  
Attorney for Defendant  
3407 Jefferson, #128  
St. Louis, MO 63118  
(314)392-0120  
[Kay@carlyleparishlaw.com](mailto:Kay@carlyleparishlaw.com)

s/ Daniel J. Bruntrager  
Daniel J. Bruntrager #34546 (with consent)  
Attorney for Defendant  
225 S. Meramec Ave. ,

Suite 1200  
St. Louis, MO 63105  
(314) 646-0066  
(314) 646-0065-facsimile  
[djb@law-stl.com](mailto:djb@law-stl.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 6<sup>th</sup> day of September 2019 the foregoing was filed electronically with the Clerk of Court with the electronic filing system, to be served by operation of that system on all attorneys of record.

/s/ Kathryn B. Parish